



# SIERRA CLUB

June 18, 2020

*Via electronic delivery*

C. Joanne Wessinger-Hill, Esq.  
Public Service Commission of South Carolina  
101 Executive Center Dr. Suite 100  
Columbia, South Carolina 29210

**Re: Application of Dominion Energy South Carolina, Incorporated for  
Adjustment of Rates and Charges (See Commission Order No. 2020-313)  
Docket No. 2020-125-E**

Dear Ms. Wessinger-Hill,

On behalf of Robert Guild, for the Sierra Club, we appreciate the opportunity to provide input on the procedural schedule for the Dominion Energy South Carolina (DESC) Rate Case, Docket No. 2020-125-E. Our proposed schedule is based upon the assumption that DESC will file its Application for Rate Adjustment on Friday August 14, 2020; however, if DESC instead waits one week and files its Application on August 21, 2020; we would ask that all dates be shifted by one week, including the hearing date. The hearing would then commence on January 12, 2021.

It is our understanding that the Office of Regulatory Staff (ORS) and DESC will be submitting a joint proposed schedule. Due to the condensed timeline of this proceeding between DESC's filing and the hearing date, we offer alternative dates for the Commission to consider in order to give the parties sufficient time to conduct discovery and prepare their testimony. This is especially important given the fact that the Joint Proposed Schedule from the ORS and DESC cuts discovery off on November 17, 2020, which is prior to DESC filing its rebuttal testimony. It is imperative that the parties have the ability to conduct discovery on DESC's rebuttal testimony in order to substantiate any claims they may raise; therefore we ask that the discovery deadline be pushed back to December 1.

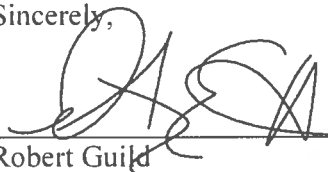
In addition, we request the Commission to shorten the time parties have to respond to discovery from twenty (20) days to ten (10) days under R.103-833 of the South Carolina Code of Regulations. We believe there is good cause to shorten the discovery response time due to the condensed timeline and the intervening holidays, in this proceeding. For example, if we maintained the 20 day response time, the parties would not be able to ask for and receive discovery on DESC's rebuttal testimony in time to file sur-rebuttal testimony on December 15, 2020. Likewise, DESC would not have sufficient time to ask for and receive discovery on other parties' direct testimony in time to file its rebuttal testimony. Shortening the discovery response

time will therefore be beneficial to all parties of record and ensure that all parties, and the Commission, have access to the information used to support its testimony. Our alternative proposed schedule is as follows:

1. **August 14:** DESC files its Rate Case Application
2. **August 28:** DESC files its Direct Testimony and Exhibits
3. **November 10:** All Other Parties' of Record and ORS file its Direct Testimony and Exhibits
4. **November 30:** DESC files any Rebuttal Testimony and Exhibits
5. **December 1:** Discovery shall end on this date and no Party of Record may serve discovery upon another Party of Record after this date.
6. **December 15:** All Other Parties' of Record file any Surrebuttal Testimony and Exhibits
7. **January 5:** Hearing will commence and continue thereafter until completed
8. **January 25:** Any Party of Record may file a Post-Hearing Briefs and/or Proposed Order

Please contact me with any questions.

Sincerely,



on behalf of

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